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13 **Pro hac vice application forthcoming*

14 *Attorneys for Defendant*
15 *MGM Resorts International*

16

17

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 MICHAEL PIRCIO, individually and on behalf
21 of all others similarly situated

22 Plaintiff,

23 v.

24 MGM RESORTS INTERNATIONAL,

25 Defendant.

Case No. 2:23-cv-1550-CDS-NJK

26 **STIPULATION TO EXTEND TIME**
27 **TO FILE DEFENDANT'S**
28 **RESPONSE TO COMPLAINT**
(FIRST REQUEST)

1 Pursuant to LR IA 6-1, Plaintiff Michael Pircio and Defendant MGM Resorts
 2 International (“MGM”) respectfully stipulate that MGM’s time to respond to the Complaint
 3 be extended from the current deadline of October 23, 2023 to and including December 12,
 4 2023. This is the first stipulation for an extension of time to file MGM’s responsive pleading.

5 Good cause exists to enlarge the time for MGM to respond to the Amended
 6 Complaint. Between September 21 and October 3, 2023, nine other related actions were filed
 7 against MGM in this and two other federal courts (the “Related Actions”). *See Owens v.*
 8 *MGM Resorts Int’l*, No. 2:23-cv-01480 (D. Nev.); *Zussman v. VICI Properties I LLC, et al.*,
 9 No. 2:23-cv-01537 (D. Nev.); *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549 (D. Nev.);
 10 *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int’l*,
 11 No. 2:23-cv-01577 (D. Nev.); *Rundell v. MGM Resorts Int’l*, No. 2:23-cv-01698 (D. Nev.);
 12 *Bezak v. MGM Resorts Int’l*, No. 2:23-cv-01719 (D. Nev.) *Albrigo v. MGM Resorts Int’l*,
 13 No. 3:23-cv-01797 (S.D. Cal.); *Lassoff v. MGM Resorts Int’l, et al.*, No. 1:23-cv-20419
 14 (D.N.J.);

15 MGM’s counsel was only recently retained and requires additional time to review,
 16 investigate, and analyze the allegations in both the Complaint and the Related Actions.
 17 Moreover, based on the Parties’ current understanding of the claims, there are significant
 18 overlaps between this action and the Related Actions. As such, additional time is required to
 19 permit time to meet and confer with the various parties to the Related Actions, evaluate the
 20 potential consolidation of the cases, and conserve judicial resources.

21 The Parties’ request is made in good faith to enable MGM to complete an
 22 investigation into Plaintiff’s claims. Moreover, this case is in its infancy, and this request
 23 will not prejudice any party.

24 **WHEREAS** the Parties respectfully request that the Court extend MGM’s time to
 25 answer, move, or otherwise respond to the Complaint from October 23, 2023 to and
 26 including November 12, 2023.

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STIPULATION TO EXTEND TIME TO FILE DEFENDANT’S RESPONSE TO COMPLAINT
 CASE NO. 2:23-CV-1550

1 Dated: October 23, 2023

Respectfully submitted,

2 /s/ George Haines
3

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17 *Attorneys for Defendant
MGM Resorts International*

21 **IT IS SO ORDERED:**

22 
23 United States Magistrate Judge

25 DATED: October 24, 2023